

S. BRETT SUTTON 143107
JARED HAGUE 251517
BRADY BRIGGS 310934
SUTTON HAGUE LAW CORPORATION, P.C.
5200 N. Palm Avenue, Suite 203
Fresno, California 93704
Telephone: (559) 325-0500

Attorneys for Plaintiff:
AARON DICKERSON

ADAM LEVIN (SBN 156773)
JEREMY MITTMAN (SBN 248854)
GABRIEL HEMPHILL (SBN 338222)
MITCHELL SILBERBERG & KNUPP LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067-3120
Telephone: (310) 312-2000
Facsimile: (310) 312-3100

Attorneys for Defendant:
AERA ENERGY LLC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
BAKERSFIELD DIVISION

* * *

AARON DICKERSON, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AERA ENERGY, LLC, a California limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 1:21-CV-01384-JLT-BAK

[Removed from Case No. BCV-21-
101646]

JOINT STIPULATION FOR
PLAINTIFF'S LEAVE TO FILE
THIRD AMENDED COMPLAINT

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

This stipulation is made between Plaintiff Aaron Dickerson (“Plaintiff”) and Defendant Aera Energy, LLC (“Defendant”) (collectively, the “Parties”), through their undersigned attorneys of record:

1. WHEREAS, Plaintiff filed his civil claims against Defendant in Kern County Superior Court on July 20, 2021;

2. WHEREAS, Plaintiff filed a First Amended Complaint in Kern County Superior Court on August 13, 2021;

3. WHEREAS, Plaintiff filed a Second Amended Complaint in Kern County Superior Court on September 13, 2021;

4. WHEREAS, Defendant removed the Action to United States District Court, Eastern District of California – Bakersfield Division on September 16, 2021;

5. WHEREAS, the Parties participated in a mediation under the supervision of mediator Scott Markus, Esq. on March 17, 2022;

6. WHEREAS, the Parties are still engaged in ongoing settlement discussions and have resolved to participate in a further mediation session with Mr. Markus, which the Parties are in the course of scheduling;

7. WHEREAS, in the course of these settlement discussions, Plaintiff determined to file a Third Amended Complaint to further refine his claims and proposed class definitions, and Defendant has agreed to stipulate to the Court’s granting leave to Plaintiff to file his Third Amended Complaint; and

8. WHEREAS, the Parties discussed this plan during the May 2, 2022 Mid-Discovery Status Conference with Judge Grosjean;

NOW THEREFORE, it is hereby stipulated and agreed by and between the Parties to the above-entitled Action through their respective attorneys of record that:

1 1. Plaintiff be granted leave to file his Third Amended Complaint a copy of which is
2 attached hereto as Exhibit "A" and shall be deemed as filed as of the date that the Court enters an
3 order approving this Joint Stipulation;

4 2. Defendant waives notice and service of the Third Amended Complaint other than
5 service of this Stipulation; and

6 3. Defendant will file its Answer to the Third Amended Complaint within 20
7 calendar days from the date that issues an order approving this Joint Stipulation.

8
9 DATED: May 17, 2022

Respectfully Submitted,

10
11 SUTTON HAGUE LAW CORPORATION, P.C.

12 By: /s/ - Jared Hague.
13 S. BRETT SUTTON
14 JARED HAGUE
Attorneys for Plaintiff
AARON DICKERSON

15 DATED: May 17, 2022

Respectfully Submitted,

16
17 MITCHELL SILBERBERG & KNUPP, LLC.

18
19 By: /s/ - Jeremy Mittman
20 ADAM LEVIN
21 JEREMY MITTMAN
22 GABRIEL HEMPHILL
Attorneys for Defendant
AERA ENERGY, LLC